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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF OREGON

12 In re

13 Van's Aircraft, Inc.,

14 Debtor.
15
16

Case No. 23-62260-dwh11

**STIPULATED MOTION FOR ENTRY
OF STIPULATED ORDER
EXTENDING DEADLINE TO OBJECT
TO CLAIM NO. 572 (VAN'S
AIRCRAFT, INC. EMPLOYEE STOCK
OWNERSHIP PLAN)**

17 Van's Aircraft, Inc. ("Van's") and the Van's Aircraft, Inc. Employee Stock Ownership
18 Plan ("ESOP") move this Court for entry of a stipulated order extending the deadline for Van's
19 to object to Claim No. 572 of the ESOP (the "ESOP Claim") to September 30, 2024, as set forth
20 below, and state as follows:

21 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant
22 to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 (the "Plan"). The Plan became effective
23 on June 1, 2024 (the "Effective Date").

24 2. Pursuant to Article 7.1 of the Plan, unless otherwise ordered by this Court, all
25 objections to Claims and Scheduled Amounts (other than Administrative Expense Claims) are to
26

1 be filed with the Court and served upon the holder of the Claim objected to on or before sixty
2 days after the Effective Date, which deadline is July 31, 2024 (the "Claim Objection Deadline").

3 3. Van's has been working diligently with counsel for the ESOP to terminate the
4 ESOP, in accordance with the Plan. Van's expects that process will be completed by September
5 30, 2024, and that the ESOP Claim will be resolved upon completion of that process.

6 4. Van's certifies that, for the reasons set forth herein, the requested extension is in
7 good faith, Van's appropriately used the prior time, and that the continuance is being requested
8 at the earliest time practical. This is Van's first request for an extension of the Claim Objection
9 Deadline. Van's and the ESOP have agreed to stipulate to an extension of the Claim Objection
10 Deadline, as it pertains to the ESOP Claim, to September 30, 2024.

11 5. Attached hereto as **Exhibit 1** is a proposed Stipulated Order Extending Deadline
12 to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan).

13 6. WHEREFORE, Van's and the ESOP pray this Court enter the Stipulated Order
14 Extending Deadline to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership
15 Plan).

16 DATED: July 30, 2024.

17 TONKON TORP LLP

18 By /s/ Ava Schoen

19 Timothy J. Conway, OSB No. 851752
20 Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

21 IT IS SO STIPULATED:

22 TONKON TORP LLP

SUSSMAN SHANK LLP

23 By /s/ Ava Schoen

24 Timothy J. Conway, OSB No. 851752
25 Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
26 Attorneys for Debtor

By /s/ Christopher Coyle

Christopher Coyle, OSB No. 073501
Attorney for Van's Aircraft, Inc.
Employee Stock Ownership Plan

EXHIBIT 1

Proposed Form of Stipulated Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**STIPULATED ORDER EXTENDING
DEADLINE TO OBJECT TO CLAIM
NO. 572 (VAN'S AIRCRAFT, INC.
EMPLOYEE STOCK OWNERSHIP
PLAN)**

THIS MATTER having come before the Court upon the Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan) [ECF No. ____] (the "Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to Claim No. 572 of the Van's Aircraft, Inc. Employee Stock Ownership Plan is extended to September 30, 2024.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By /s/

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Michael W. Fletcher, OSB No. 010448
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IT IS SO STIPULATED:

TONKON TORP LLP

SUSSMAN SHANK LLP

By /s/ Ava Schoen

Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
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By /s/ Christopher Coyle

Christopher Coyle, OSB No. 073501
Attorney for Van's Aircraft, Inc.
Employee Stock Ownership Plan